

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA**

Jordan Schwyhart, *on behalf of*)
himself and others similarly situated,)
))
Plaintiff,)
) **Civil Case No.: 2:15-CV-01175-WMA**
vs.)
))
Amsher Collection Services, Inc.,)
))
Defendant.)

REPORT OF THE PARTIES' PLANNING MEETING

1. The following persons participated in a Rule 26(f) conference on September 23, 2015: Aaron D. Radbil on behalf of Jordan Schwyhart, and Laura C. Nettles on behalf of AmSher Collection Services, Inc.
2. Initial Disclosures. The parties will serve the initial disclosures required by Rule 26(a)(1), on or before: October 7, 2015.
3. Discovery Plan. The parties propose this discovery plan:
 - (a) Discovery will be needed on these subjects: The merits of Plaintiff's claims and Defendant's defenses, as well as class certification.
 - (b) Dates for commencing and completing discovery, including discovery to be commenced or completed before other discovery: All discovery to be completed by July 22, 2016.
 - (c) Maximum number of interrogatories by each party to another party: Fifty.
 - (d) Maximum number of requests for admission: Fifty.
 - (e) Maximum number of depositions by each party: Fifteen.

- (f) Limits on the length of depositions, in hours: Seven.
- (g) Dates for exchanging reports of expert witnesses: May 6, 2016.
- (h) Dates for supplementations under Rule 26(e): July 22, 2016.

4. Other Items:

- (a) Final dates for the plaintiff to amend pleadings or to join parties: January 8, 2016.
- (b) Final dates for the defendant to amend pleadings or to join parties: January 8, 2016.
- (c) Final dates to file motions for class certification: August 19, 2016.
- (d) Final dates to file dispositive motions: September 23, 2016.
- (e) State the prospects for settlement: Unknown at this time. The parties, however, agree to engage in good faith settlement discussions
- (f) Identify any alternative dispute resolution procedure that may enhance settlement prospects: Private mediation following completion of necessary discovery.
- (g) Final dates for submitting Rule 26(a)(3) witness lists, designations of witnesses whose testimony will be presented by deposition, and exhibit lists: November 11, 2016.
- (h) Final dates to file objections under Rule 26(a)(3): November 25, 2016.
- (i) Suggested trial date and estimate of trial length: December 12, 2016; 3 days.
- (k) Other matters:

No notes, drafts, or other preliminary written work by or for experts regarding the subject matter in this case are subject to discovery. No communications between a party's counsel and that party's expert (or the counsel or expert's support staff) will be the subject of discovery

(however the factual information itself relied on by the expert in forming his or her opinions are discoverable regardless of whether it was supplied by counsel).

The parties agree, under Fed. R. Civ. P. 5(b)(2)(E), to accept electronic service of documents not filed with this Court. The parties also agree to accept electronic service of documents filed with this Court under seal. The parties agree that service is effective on the date of electronic service.

Date: October 19, 2015

/s/ Laura C. Nettles

Laura C. Nettles

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Counsel for Plaintiff and the proposed
Class

CERTIFICATE OF SERVICE

I certify that on October 19, 2015 I filed a copy of the foregoing through the Court's ECF system, which will send notification of the filing to counsel of record.

/s/ Laura C. Nettles

OF COUNSEL